

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA-SANTA ANA DIVISION

In Re:

GILDA NOEMI SANCHEZ
CESAR JACOBO PEREZ,

Debtor.

CASE NO.: 8:17-bk-14446-CB

CHAPTER 13

**EVIDENTIARY OBJECTION TO
MOTION TO VALUE**

DATE: 3/8/2018
TIME: 1:30 pm
CTRM: 5D
PLACE: 411 W. Fourth St., Santa Ana,
CA 92701

Honorable Catherine E. Bauer

Deutsche Bank National Trust Company, as certificate trustee on behalf of Bosco Credit II Trust Series 2010-1, its successors and/or assignees, (hereinafter “Creditor, hereby submits the following Evidentiary Objection.

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Document	Grounds
Exhibit 2 to the Motion to Value	Best evidence, lack of authentication, and hearsay. Evidence Code § 801, 901
Declaration of Debtors, pg. 10 paragraph 6	Best evidence, speculation, foundation, lacks personal knowledge, and hearsay. Evidence Code § 602, 801, 901
Exhibit 6 Appraisal	Best speculation, foundation, assumes facts not in evidence, and improper opinion Evidence Code § 602, 701

Dated: February 22, 2018

Respectfully submitted,

LAW OFFICES OF MICHELLE GHIDOTTI

/s/ Kristin A. Zilberstein

Kristin A. Zilberstein, Esq.

Attorney for Deutsche Bank National Trust Company,
as certificate trustee on behalf of Bosco Credit II Trust
Series 2010-1

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1920 Old Trustin Ave.
Santa Ana, CA 92705

A true and correct copy of the foregoing document entitled (*specify*): _____

EVIDENTIARY OBJECTION TO MOTION TO VALUE

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 02/22/2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Debtor's Counsel: Danny K Agai, dannyagai@gmail.com
Trustee: Amrane (SA) Cohen (TR), efile@ch13ac.com
U.S. Trustee: United States Trustee (SA), ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 02/22/2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor: Gilda Noemi Sanchez, 110 S. Jeanine Way, Anaheim, CA 92806 (U.S. Mail)
Joint Debtor: Cesar Jacobo Perez, 110 S. Jeanine Way, Anaheim, CA 92806 (U.S. Mail)
Judge: Honorable Catherine E. Bauer, 411 West Fourth Street, Suite 5165, Santa Ana, CA 92701-4593 (U.S. Mail)

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

02/22/2018
Date

Jeremy Romero
Printed Name

/s/ Jeremy Romero
Signature